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8 Attorneys for Defendant  
9 PAUL FREDRICK GIUSTI

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 PAUL FREDRICK GIUSTI,

17 Defendant.

Case No. 3:21-CR-00294-WHO

**STIPULATION AND [PROPOSED]  
ORDER AUTHORIZING  
MODIFICATION OF CONDITIONS OF  
RELEASE**

18  
19 On November 23, 2020, this Court placed Paul Giusti on pretrial release in the above-  
20 captioned matter. A condition of his release limits his travel to the Northern and Eastern Districts  
21 of California. Under the same conditions of release following his August 13, 2021 guilty plea,  
22 Mr. Giusti now seeks permission to travel to an event in Muncie, Indiana, located in the Southern  
23 District of Indiana, from June 27-July 3, 2023. Pretrial Services Officer Bradley Wilson has  
24 advised that he supports Mr. Giusti in domestic travel. Assistant United States Attorney David  
25 Ward has no objection to this proposed modification.

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28 STIPULATION AND [PROPOSED] ORDER  
AUTHORIZING MODIFICATION OF  
CONDITIONS OF RELEASE  
3:21-cr-00294-WHO

1 SO STIPULATED.

2 Dated: May 11, 2023

ISMAIL J. RAMSEY  
UNITED STATES ATTORNEY

3  
4  
5 By: /s/  
6 DAVID J. WARD  
Assistant United States Attorney

7 Dated: May 11, 2023

DECHERT LLP

8  
9 By: /s/  
10 HARTLEY M.K. WEST  
Attorneys for Defendant Paul Giusti

11  
12  
13 **[PROPOSED] ORDER**

14 **GOOD CAUSE BEING SHOWN**, Mr. Giusti's conditions of pretrial release shall be  
15 modified to allow him to travel to Muncie, Indiana from June 27-July 3, 2023. All other  
16 conditions of Mr. Giusti's pretrial release shall remain in full force and effect.

17 **IT IS SO ORDERED.**

18  
19 Date: \_\_\_\_\_

HON. WILLIAM H. ORRICK  
UNITED STATES DISTRICT JUDGE